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October 30, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

**Re: Notice of Ex Parte Communications and Supplemental Comments on Draft
Ownership Order and Review of the Local Radio Ownership Rules Dealing
with Embedded Radio Markets
MB Docket Nos. 09-182 and 14-50**

Dear Ms. Dortch:

Connoisseur Media LLC, by the undersigned attorney, files these comments on the draft decision on the “embedded market” issue contained in the FCC’s draft *Order on Reconsideration and Notice of Proposed Rulemaking* in MB Dockets 14-50 et al, released October 26, 2017 (the “*Draft Order*”), cannot be adopted as it is based on a fundamental misconception of the embedded market issue.¹ As detailed below, the *Draft Order* is based on the meaning given by Nielsen Audio and BIA to the designation of a radio station that is home to an embedded market as being above-the-line in the “parent” market. Attached to this letter are statements from both Nielsen Audio and BIA demonstrating that the *Draft Order*’s interpretation of the meaning of this designation is incorrect. This fundamental misconception of the nature of embedded markets, and the additional information already provided in the record of this proceeding, require the Commission to change course on this issue.

¹ The *Draft Order* rejects Connoisseur’s Petition for Reconsideration (the “*Petition for Reconsideration*”) of the Commission’s treatment of embedded markets in the *Second Report and Order* in the referenced dockets. See *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Second Report and Order*, MB Docket Nos. 14-50, 09-182, 07-294, and 04-256, 31 FCC Rcd 9864 (2016)(“*Second Report and Order*”).

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The crux of the *Draft Order's* discussion of the embedded markets comes down to one finding – that the inclusion by Nielsen Audio of stations licensed to communities which are located in embedded markets means that Nielsen Audio has determined these stations to be competitors in both the embedded market and the greater parent market. That determination is most succinctly stated in paragraph 92 of the *Draft Order*, where it is stated:

As the Commission noted in the Second Report and Order, it has long relied on Nielsen Audio's market analysis, as reported by BIA, which lists all the stations that are deemed to compete in a given market (often referred to as "above-the-line" stations), as the basis for multiple ownership calculations for embedded and parent markets. Nielsen Audio's market definitions are recognized as the industry standard and provide for consistency and ease of application in comparison to other possible methods for defining local radio markets. *The inclusion of an embedded market station as an above-the-line station in a parent market therefore reflects a determination by Nielsen Audio that, absent other information, the station competes in that market.*²

Connoisseur believes that, even if this statement accurately described the meaning of an embedded market station being listed above-the-line, it is arbitrary for the Commission to blindly rely on the designation by two private companies as to the state of competition in the parent market when faced with the plethora of unrefuted contrary evidence in the record of this proceeding that embedded market stations do not compete in the parent market. However, there is a much more direct method of ascertaining what Nielsen Audio and BIA mean when they list an embedded market station as being above-the-line in a parent market. In light of the *Draft Order's* reliance on what Nielsen and BIA mean by an above-the-line designation in a parent market, Connoisseur has asked each of these organizations to explain what in fact is meant by the designation of embedded market stations as being above-the-line in the parent market. Statements from both BIA and Nielsen Audio are attached, as Exhibits 1 and 2 respectively, and they demonstrate that the assumptions made *Draft Order* are simply incorrect.³

As set forth in each of these statements, the inclusion of an embedded market station as being above the line in the parent market *is not based on a determination that the station*

² Footnotes omitted, emphasis added. *See, also*, the statement in the *Draft Order* at paragraph 95: "We continue to recognize that Nielsen Audio and BIA's practice of designating all embedded market stations as "home" to the parent market-regardless of actual market share-could, in some instances, result in stations being counted for multiple ownership purposes in a market in which they do not compete."

³ In the interests of time, Nielsen asked Connoisseur to summarize its understandings of the issues at hand here, and Connoisseur's understandings of the meaning of the Nielsen Audio designations. Nielsen Audio's responsive letter states: "We confirm each of the understandings described in your letter with two clarifications." Neither clarification is relevant to the discussion here. Connoisseur's letter and Nielsen's response are attached as Exhibit 2.

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competes in the parent market, but is instead simply a statement of geography. Nielsen has a policy of including any station licensed to a community located within the geographic boundaries of the political subdivisions within a market as being above-the-line in that market. As the geographical limits of the parent market by definition encompass the area within the embedded markets, and the embedded market stations are licensed to communities in those areas, they are included in the listing of above-the-line stations in the parent market. This inclusion is not based on any assessment of competition, but simply by geography. In other words, the *Draft Order's* finding that being listed above-the-line means that Nielsen has found that these stations compete in the parent market is simply wrong.⁴

Both of the Nielsen and BIA statements go on to make clear that the very reason that embedded markets exist is that the stations in these markets *do not compete in the parent market*, but instead compete locally within the embedded market. The establishment of an embedded market, as with the creation of any other Nielsen market, is Nielsen's recognition of an area where a set of stations primarily compete. If these embedded market stations all competed in the parent market as the *Draft Order* suggests, there would be no need for embedded markets at all. Instead, if all of the embedded markets stations competed in the parent market, they would simply be listed as stations in the parent market. The existence of the embedded market shows that each of these embedded markets is a unique area, like any other Nielsen market, where the stations home to that market compete.⁵

Throughout this proceeding, Connoisseur has argued, and provided substantial unrefuted and unchallenged evidence, that the only reason that the "embedded" markets have this special characterization is because the parent market stations look at these outlying areas as part of their market for listeners and part of the area which the parent-market stations can tell advertisers that they serve.⁶ It is because the parent market stations compete in the areas encompassed by the embedded markets that the special term "embedded" is applied, not because the local stations home to the embedded markets compete in the parent market. Both the BIA and Nielsen statements confirm those arguments of Connoisseur.

BIA's statement sets forth that in its list of FCC Geographic Markets, it lists what it considers to be the "home" market of each station that it considers to be part of that market. In

⁴ E.g., Statement of Mark Fratrik ("*BIA Statement*") at paragraph 9. "That listing of an embedded station in the parent market report does not reflect a determination by Nielsen Audio nor BIA/Kelsey that, absent other information, the station competes in that parent market. It just reflects that their city of license is geographically located within the boundaries of the parent market. It is a reflection of geography, not an analysis of competition."

⁵ E.g., BIA Statement at paragraphs 12-13.

⁶ See, e.g. Petition for Reconsideration at p. 4-6.

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the FCC Geographic Market reports for New York and Washington DC, attached as Exhibit 3 hereto, all of the embedded market stations are listed as being “home” to the embedded market, not to the parent market. Further, BIA, when it provides market revenue data, considers revenues for the embedded market stations to be allocable only to the embedded market, not to the parent market. The revenues listed for the parent market stations do not include the revenues of the embedded market stations, again demonstrating that BIA does not consider them to be competitors in that market that add to the market revenue of the parent market.

Given the statements of BIA and Nielsen attached to this letter, the adoption of the *Draft Order* would be arbitrary and capricious – without any record evidence to support it and refuted not only by these statements but also by all of the unchallenged record evidence already introduced by Connoisseur. The entire basis of the decision is that Nielsen Audio and BIA’s designation of an embedded market station as being above-the-line in the parent market constitutes an industry-accepted determination that these stations compete in the parent market is simply incorrect, as shown by the attached statements of Nielsen and BIA.

But, for the sake of completeness of the record, Connoisseur will also point out several other statements in the *Draft Order* that lack any basis in the record. The *Draft Order*’s reliance on a conclusion that embedded market stations compete in the parent market not only cannot be based on reliance on Nielsen and BIA, as shown above, but it also cannot be based on the unrefuted facts in the record. Connoisseur has provided convincing evidence that the embedded market stations do not in fact compete in the parent market. It has shown that, even if one party were to own every embedded market station in the every embedded market in the New York City parent market (which is impossible as that ownership would far exceed the ownership limits in each of the embedded markets⁷), it would have approximately half the market share of the two largest owners in the parent market.⁸ In the Washington DC parent market, that ownership would rank the owner of every embedded market station as at best a weak sixth in the market.⁹

Moreover, Connoisseur has provided a county-by-county breakdown of the listening of the embedded market stations. That exhibit shows that virtually all of the listening to those

⁷ For instance, as shown in Exhibit 3, in the Nassau/Suffolk embedded market, there are 46 stations that BIA lists as being home to the market, meaning that, as one party can only own 8 stations in a market of that size), there are at least 38 stations that one party could not own.

⁸ Petition for Reconsideration at p. 6 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016) at Exhibit 1.

⁹ Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 6, 2017) at p. E-5.

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stations comes from listeners in the home counties of the embedded market, not from listeners in the parent market or in other embedded markets.¹⁰

The *Draft Order* suggests without any record evidence that these listening patterns could change over time. At paragraph 93, the Draft Order states that, in the embedded market situation, “the core location of a station’s listenership has the potential to shift geographically over time in a parent/embedded market scenario in a way that would be unlikely, or even impossible, where, as in Puerto Rico, the physical terrain prevents a station from reaching other geographic areas.”¹¹ This statement ignores the record evidence submitted by Connoisseur showing that the embedded market station with the greatest 1 mv/m coverage of the greater New York parent market has just over 50% coverage of that market, while the vast majority of the other embedded market stations fall below 50% market coverage – most substantially below. By contrast, the parent market station with the least coverage covers 80% of the parent market, with most parent market stations having 80% coverage.¹² A station cannot serve an area in which it does not have a signal, and the *Draft Order* seems to have ignored these facts. And there is no suggestion in the record, or any evidence cited by the Commission, that in the spectrum congested markets of New York and Washington DC these coverage areas could be changed.¹³

¹⁰ Petition for Reconsideration at fn. 7 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016)(analyzing New York parent market); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at pp. E6-7 (filed June 6, 2017)(analyzing Washington DC parent market).

¹¹ The reference to Puerto Rico is made as, in the Petition for Reconsideration, Connoisseur contended that the rejection of Connoisseur’s argument that Nielsen Audio should not be relied on in the embedded markets was arbitrary in light of the Commission’s rejection in connection with stations in Puerto Rico of the use of Nielsen Audio market designations as the basis of decisions on compliance with the local ownership rules.

¹² Petition for Reconsideration at p. 7 citing Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016) at Exhibit 2.

¹³ Perhaps it was assumed by the *Draft Order* that embedded market stations could change transmitter sites to better serve the parent market, but that statement is not made in the *Draft Order*. Even if that is the implication, that same kind of change could be made by stations in markets like Puerto Rico – the difference being that in a parent market like New York, or even Washington DC, you are dealing with some of the most spectrum-congested areas in the country, where it simply is not possible to make widespread coverage changes. If suburban stations could have moved their transmitter sites to allow greater coverage of New York, the largest market in the country, it would be irrational to believe that this kind of coverage improvement would not have already been made.

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The *Draft Order*, in rejecting a decision to change the rules for all embedded markets, states that the waiver process is better suited to making decisions about combinations of stations in different embedded markets, as “characteristics of different embedded markets vary, including their geographic proximity to other embedded markets and to the central city of the parent market.”¹⁴ In fact, in all relevant respects to the analysis here, these embedded markets are remarkably similar. Connoisseur has shown that in all embedded markets, both in the New York and Washington parent markets, there is remarkably little commuting by residents of one embedded market to another (though all have substantial commuting to the center city).¹⁵ As set forth in the prior paragraph, the signal strength of the stations in each embedded market is insufficient to reach the majority of the parent market. And there is very little or no listening by residents of one embedded market to stations from another embedded market (though, again, there is significant listening in each embedded market to the stations from the central city).¹⁶

These embedded markets really are just like any other Nielsen Audio market and should be treated as such for local ownership purposes. Connoisseur has shown that there are many other adjacent Nielsen markets where cross-market listening far exceeds the level of such listening by residents of one embedded market to stations from other embedded markets. Yet in those other markets, one owner can own up to the maximum number of stations in each adjacent market with no Commission scrutiny.¹⁷ Denying that same treatment to licensees in embedded markets, simply because Nielsen has called them “embedded,” with no other policy reason justifying such treatment, is arbitrary.

Connoisseur is not asking for any action that would upset the Commission’s reliance on Nielsen Audio, as interpreted by BIA, as the basis of its local radio ownership analysis. Instead, it is simply asking for that same treatment to be applied to the owners of stations located exclusively in the embedded markets, as those markets really are just like any other – but for the fact that their economic environment is so much harder to operate a business as so much of the revenue is recognized by the parent market stations. Embedded market stations need to be able to recognize the economies and synergies that can be realized by owning stations in

¹⁴ Draft Order at fn. 280.

¹⁵ Petition for Reconsideration at pp. 7-8 citing Connoisseur’s Initial Comments in this proceeding filed on August 6, 2014 (“Initial Comments”) at pp. 5-7 (New York); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at p. E-2 (filed June 6, 2017) (Washington DC).

¹⁶ Petition for Reconsideration at pp. 7-8, citing Connoisseur’s Initial Comments at pp. 5-7 (New York); Letter from David Oxenford, Counsel to Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 at p. E-3 (filed June 6, 2017) (Washington DC).

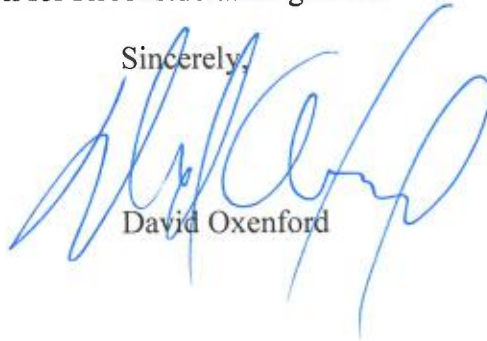
¹⁷ Letter from David Oxenford, Counsel for Connoisseur Media LLC to Marlene Dortch, Secretary, FCC, MB Docket Nos. 09-182 and 14-50 (filed October 17, 2017).

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geographically proximate markets. Given the lack of evidence supporting the *Draft Order*, and the specific refutation of its underlying premise by the letters of Nielsen and BIA, the conclusions of the *Draft Order* must be rejected, and Connoisseur's petition for reconsideration of the Second Report and Order must be granted.¹⁸

Connoisseur thanks the Commission for issuing the *Draft Order* so that it could be reviewed before being adopted. This new policy of issuing draft Orders was designed to increase transparency so that the Commission could have potential errors highlighted before they were adopted. That policy worked in this case, allowing Connoisseur to clarify the record.¹⁹ Connoisseur respectfully requests that the decision reflected in the *Draft Order* be changed as stated herein, and Connoisseur's Petition for Reconsideration granted.

Sincerely,



David Oxenford

Enclosures

¹⁸ Connoisseur notes that while both in Petition for Reconsideration and in a supporting filing of the NAB, methodologies were advanced to provide a guard against the abuse of the change in the treatment of embedded markets urged by Connoisseur. As the BIA Statement, at paragraph 11 makes clear, BIA already provides that guard against abuse as it will classify an embedded market station that truly competes in the parent market as being home to the parent market, as it does with station WKTU. This is exactly the same methodology that BIA uses in other markets non-embedded markets to guard against abuse of the Nielsen Audio market designations.

¹⁹ The undersigned counsel for Connoisseur and Bryan Tramont of this office had a telephonic meeting with Nirali Patel of the Office of Commissioner Carr this date to preview the contents of this filing. Mr. Tramont also spoke with Ms. Patel on October 27, 2017 to express Connoisseur's concerns about the *Draft Order* and to indicate that Connoisseur would be submitting this supplemental filing.

Exhibit 1

DECLARATION OF MARK R. FRATRIK, PH.D.

1. I am a Senior Vice President, Chief Economist at BIA/Kelsey, a research, financial and strategic consulting firm for the communications industries. I have been with this firm for nearly 17 years.
2. In that role I supervise the collection of data included in BIA/Kelsey's Media Access Pro™ database of all commercial radio and television stations and daily and weekly newspapers. I am also involved in several strategic and financial consulting engagements relating to the radio, television and related industries.
3. I have been asked by Connoisseur Media to clear up any misunderstandings as to how BIA/Kelsey treats embedded radio markets, and how BIA/Kelsey views the competition of local radio stations within and between embedded markets.
4. BIA/Kelsey has a long history of reporting embedded radio markets within its proprietary database program, Media Access Pro™, as well as the accompanying quarterly publication, *Investing In Radio*. Each of these embedded markets are treated as separate markets in all instances, with each embedded market having a separate page in the publication. Users of the database program as well as the publication want these radio markets displayed in this way. No one in my nearly 17 years at BIA/Kelsey has ever voiced a different opinion on this matter.
5. Each of these embedded markets have independent market revenue estimates reflecting the competition of radio stations within these markets. The advertising market revenue for these embedded markets are NOT included as revenue attributable to the parent market, and are the sum of the advertising revenue generated of only those radio stations listed as home to the embedded markets.

6. The revenue share attributable to each of these embedded market radio stations are those individual station revenues divided by *only* the total revenue for that embedded market since those embedded markets stations are competing against only the other stations in the embedded markets for that revenue.
7. In its Media Access Pro™ database software, there is a pre-programmed query and related report defined as the BIA/Kelsey FCC Geographic Market Reports. This report provides the listing of local radio stations located in the Nielsen Audio radio markets used to determine the number of stations in a Nielsen Audio radio market for analysis of compliance with the FCC's local radio ownership rules.
8. For the markets that include embedded markets (parent markets), that report include all stations that are listed as home to the parent market. Additionally, that report also includes all stations that have a city of license physically located within the boundaries of that parent market, per FCC Local Ownership Rules. These stations would include stations licensed to communities that are located in an embedded market.
9. That listing of an embedded station in the parent market report does not reflect a determination by Nielsen Audio nor BIA/Kelsey that, absent other information, the station competes in that parent market. It just reflects that their city of license is geographically located within the boundaries of the parent market. It is a reflection of geography, not an analysis of competition.
10. Included in those reports for these stations that are physically located in the parent market but are listed as home to another market (e.g., embedded stations) are the actual listing of that other home market in which these stations really compete. See

the most recent New York parent market FCC Geographic Market Report attached, showing that virtually all of the embedded market stations as being “home” to the embedded market in which it really competes.

11. In those rare cases where a station whose city of license is located in the embedded market *but* competes in the wider parent market, they are listed as home to the parent market. One such example is WKTU (FM), licensed to Lake Success, NY, that is geographically part of the embedded Nassau-Suffolk, NY market. Yet, because of its transmitter site and its coverage over the wider New York, NY radio market, it is effectively a competitor in that wider market, and is listed in the BIA/Kelsey database as being home to that parent market.
12. The BIA/Kelsey’s treatment of embedded market reflects economic reality of local radio markets. Users of the database software as well as the related publications want a realistic view of the competition facing each and every radio station. By considering these embedded markets as separate relevant markets, BIA/Kelsey provides that needed information.
13. It is significant to realize that Nielsen Audio (and previously Arbitron) established these embedded markets due to the demand in the marketplace. Radio stations in these embedded markets wanted audience estimates in the area in which they compete, the embedded market. If embedded market stations really competed in the parent market, there would be no need to have embedded markets. They would simply be included in the parent market audience estimates. The reason that these markets exist is because the embedded market is where the local stations compete, not in the parent market.

14. BIA/Kelsey recognizes that competition and thus generates the market pages in its publication to reflect that competition.

A handwritten signature in black ink, reading "Mark R. Fratrik". The signature is written in a cursive style with a large, stylized "M" and "F".

Mark R. Fratrik, Ph. D.
Sr. Vice President, Chief Economist
BIA/Kelsey



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Market			Home Market	City & State of License	County of License
				Designn	Home Mkt Rank	Owner			
WABC	AM	770	C	News/Talk	1	Cumulus Media Holdings Inc	New York, NY	New York, NY	New York
WADB	AM	1310	C	News/Talk	53	Townsquare Media Incorporated	Monmouth-Ocean, NJ	Asbury Park, NJ	Monmouth
WADO	AM	1280	C	SpNws/Sprt	1	Univision	New York, NY	New York, NY	New York
WALK	AM	1370	C	Adlt Strndrd	20	p Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	Patchogue, NY	Suffolk
WALK	FM	97.5	C	Hot AC	20	p Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	Patchogue, NY	Suffolk
WANR	FM	88.5	NC	Nws/Tlk/Inf	40	WAMC/Northeast Public Radio	Hudson Valley, NY	Brewster, NY	Putnam
WARY	FM	88.1	NC	Variety	40	Westchester Community College	Hudson Valley, NY	Valhalla, NY	Westchester
WAWZ	FM	99.1	C	ChrsContem	42	Pillar of Fire	Middlesex-Somerset-Union, NJ	Zarephath, NJ	Somerset
WAXQ	FM	104.3	C	Clsc Rock	1	iHeartMedia	New York, NY	New York, NY	New York
WBAB	FM	102.3	C	Clsc Rock	20	Cox Media Group	Nassau-Suffolk, NY	Babylon, NY	Suffolk
WBAI	FM	99.5	NC	Eclectic	1	Pacifica Foundation, Inc	New York, NY	New York, NY	New York
WBAZ	FM	102.5	C	AC	20	LRS Radio LLC	Nassau-Suffolk, NY	Bridgehampton, NY	Suffolk
WBRR	AM	1130	C	Bus News	1	Bloomberg Communications Inc	New York, NY	New York, NY	New York
WBEA	FM	101.7	C	CHR	20	LRS Radio LLC	Nassau-Suffolk, NY	Southold, NY	Suffolk
WBGO	FM	88.3	NC	Jazz	1	Newark Public Radio Inc	New York, NY	Newark, NJ	Essex
WBJB	FM	90.5	NC	AAA/NPR	53	Brookdale Community College	Monmouth-Ocean, NJ	Lincroft, NJ	Monmouth
WBLI	FM	106.1	C	CHR	20	Cox Media Group	Nassau-Suffolk, NY	Patchogue, NY	Suffolk
WBLS	FM	107.5	C	Urban AC	1	Emmis Communications	New York, NY	New York, NY	New York
WBMP	FM	92.3	C	CHR	1	CBS Radio	New York, NY	New York, NY	New York
WBON	FM	98.5	C	Latino	20	JVC Media LLC	Nassau-Suffolk, NY	Westhampton, NY	Suffolk
WBZO	FM	103.1	C	Clsc Hits	20	p Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	Bay Shore, NY	Suffolk
WCBS	FM	101.1	C	Oldies	1	CBS Radio	New York, NY	New York, NY	New York
WCBS	AM	880	C	News	1	CBS Radio	New York, NY	New York, NY	New York
WCTC	AM	1450	C	Talk	42	Beasley Media Group	Middlesex-Somerset-Union, NJ	New Brunswick, NJ	Middlesex
WCWP	FM	88.1	NC	Variety	20	Long Island University Public Radio	Nassau-Suffolk, NY	Brookville, NY	Nassau
WDBY	FM	105.5	C	Country	201	Townsquare Media Incorporated	Danbury, CT	Patterson, NY	Putnam
WDHA	FM	105.5	C	Clsc Rock	121	Beasley Media Group	Morristown, NJ	Dover, NJ	Morris
WEBE	FM	107.9	C	AC	149	Cumulus Media Holdings Inc	Stamford-Norwalk, CT	Westport, CT	Fairfield
WEDW	FM	88.5	NC	News/Talk	149	Connecticut Public Broadcasting Incorporated	Stamford-Norwalk, CT	Stamford, CT	Fairfield
WEER	FM	88.7	NC	Public Svc	20	Eastern Tower Corp	Nassau-Suffolk, NY	Montauk, NY	Suffolk
WEGB	FM	90.7	NC	Religion	20	Community Bible Church	Nassau-Suffolk, NY	Napeague, NY	Suffolk
WEGQ	FM	91.7	NC	Religion	20	Community Bible Church	Nassau-Suffolk, NY	Quogue, NY	Suffolk
WEHM	FM	92.9	C	AAA	20	LRS Radio LLC	Nassau-Suffolk, NY	Manorville, NY	Suffolk

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Market		Home Market	Designation	Mkt Rank	Owner	City & State of License	County of License
				Station	Format		Date				
WEHN	FM	96.9	C	AAA		Nassau-Suffolk, NY	07/20/2010	20	LRS Radio LLC	East Hampton, NY	Suffolk
WELJ	FM	104.7	C	Soft AC		New London, CT	07/02/2003	179	Bold Broadcasting LLC	Montauk, NY	Suffolk
WEPN	FM	98.7	C	Sports		New York, NY	07/02/2003	1	Emmis Communications	New York, NY	New York
WEPN	AM	1050	C	Span/Sprts		New York, NY	07/02/2003	1	ABC/Disney	New York, NY	New York
WFAN	FM	101.9	C	Sprts/Talk		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WFAN	AM	660	C	Sprts/Talk		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WFAS	AM	1230	C	News/Talk		Hudson Valley, NY	10/28/2011	40	Cumulus Media Holdings Inc	White Plains, NY	Westchester
WFDU	FM	89.1	NC	CHits/Oldies		New York, NY	07/02/2003	1	Fairleigh Dickinson University	Teaneck, NJ	Bergen
WFME	FM	106.3	NC	Religion		Hudson Valley, NY	07/02/2003	40	Family Stations Incorporated	Mount Kisco, NY	Westchester
WFME	AM	1560	C	Religion		New York, NY	07/02/2003	1	Family Stations Incorporated	New York, NY	New York
WFMU	FM	91.1	NC	Variety		New York, NY	07/02/2003	1	Auricle Communications	East Orange, NJ	Essex
WFRS	FM	88.9	NC	Religion		Nassau-Suffolk, NY	07/02/2003	20	Family Stations Incorporated	Smithtown, NY	Suffolk
WFTU	AM	1570	C	Alternative		Nassau-Suffolk, NY	07/20/2010	20	Five Towns College	Riverhead, NY	Suffolk
WFUV	FM	90.7	NC	AAA		New York, NY	07/02/2003	1	Fordham University	New York, NY	New York
WGBB	AM	1240	C	Asian/Varty		Nassau-Suffolk, NY	07/02/2003	20	WGBB-AM Inc	Freeport, NY	Nassau
WGCH	AM	1490	C	Nws/Tlk/BN		Stamford-Norwalk, CT	07/02/2003	149	Forte Family Broadcasting Inc	Greenwich, CT	Fairfield
WGHT	AM	1500	C	Oldies		New York, NY	07/02/2003	1	Mariana Broadcasting Inc	Pompton Lakes, NJ	Passaic
WGSS	FM	89.3	NC	Religion		Nassau-Suffolk, NY	04/24/2012	20	Calvary Chapel of Hope	Copague, NY	Suffolk
WHCR	FM	90.3	NC	Variety		New York, NY	07/02/2003	1	City College of New York	New York, NY	New York
WHFM	FM	95.3	C	Cisc Rock		Nassau-Suffolk, NY	07/20/2010	20	Cox Media Group	Southampton, NY	Suffolk
WHLI	AM	1100	C	Adlt Stndrd		Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WHPC	FM	90.3	NC	Variety		Nassau-Suffolk, NY	07/02/2003	20	Nassau Community College	Garden City, NY	Nassau
WHTG	AM	1410	C	Oldies		Monmouth-Ocean, NJ	07/02/2003	53	Press Communications LLC	Eatontown, NJ	Monmouth
WHTZ	FM	100.3	C	CHR		New York, NY	07/02/2003	1	iHeartMedia	Newark, NJ	Essex
WHUD	FM	100.7	C	AC		Hudson Valley, NY	10/28/2011	40	Pamal Broadcasting Ltd	Peekskill, NY	Westchester
WINS	AM	1010	C	News		New York, NY	07/02/2003	1	CBS Radio	New York, NY	New York
WJDM	AM	1530	C	Span/Chrst		Middlesex-Somerset-Union, NJ	07/02/2003	42	MultiCultural Radio Broadcasting Inc	Elizabeth, NJ	Union
WJUF	FM	94.9	C	News/Talk		Nassau-Suffolk, NY	02/29/2012	20	Red Wolf Broadcasting Corporation	Montauk, NY	Suffolk
WJLK	FM	94.3	C	Hot AC		Monmouth-Ocean, NJ	07/02/2003	53	Townsquare Media Incorporated	Asbury Park, NJ	Monmouth
WJSV	FM	90.5	NC	Eclectic		Morristown, NJ	07/02/2003	121	Morris School District	Morristown, NJ	Morris
WJVC	FM	96.1	C	Country		Nassau-Suffolk, NY	07/02/2003	20	JVC Media LLC	Center Moriches, NY	Suffolk
WKCR	FM	89.9	NC	Alt/Jaz/Var		New York, NY	07/02/2003	1	Columbia University	New York, NY	New York
WKDM	AM	1380	C	Asian/Mexcn		New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	New York, NY	New York

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Market			Home Market	Designation	Date	Rank	Owner	City & State of License	County of License
				Designation	Home	Mkt							
WKJY	FM	98.3	C	AC	Nassau-Suffolk, NY	20	p	07/02/2003	20	1	Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WKLV	FM	96.7	NC	ChrsContem	Hudson Valley, NY	40		10/28/2011	40		Educational Media Foundation	Port Chester, NY	Westchester
WKMB	AM	1070	C	Black Gospel	Morristown, NJ	121		07/02/2003	121		King's Temple Ministry Inc	Stirling, NJ	Morris
WKMK	FM	106.3	C	Country	Monmouth-Ocean, NJ	53		07/02/2003	53		Press Communications LLC	Eatontown, NJ	Monmouth
WKNJ	FM	90.3	NC	Variety	Middlesex-Somerset-Union, NJ	42		07/02/2003	42		Kean University	Union Township, NJ	Union
WKRK	FM	90.3	NC	Rhymc/Dan	New York, NY	1		07/02/2003	1		Kingsborough Community College	Brooklyn, NY	Kings
WKTU	FM	103.5	C	CHR/Rhymc	New York, NY	1		07/02/2003	1		iHeartMedia	Lake Success, NY	Nassau
WKWZ	FM	88.5	NC	Variety	Nassau-Suffolk, NY	20		07/02/2003	20		Syosset Central School District	Syosset, NY	Nassau
WLIB	AM	1190	C	Black Gospel	New York, NY	1		07/02/2003	1		Emmis Communications	New York, NY	New York
WLIE	AM	540	C	Spani/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Principle Broadcasting Network LLC	Islip, NY	Suffolk
WLIM	AM	1580	C	Polish	Nassau-Suffolk, NY	20		07/02/2003	20		Polnet Communications Ltd	Patchogue, NY	Suffolk
WLIR	FM	107.1	C	ChrsContem	Nassau-Suffolk, NY	20		07/20/2010	20		Livingstone Broadcasting Inc	Hampton Bays, NY	Suffolk
WLNK	AM	1420	C	Country	Poughkeepsie, NY	169		10/28/2011	169		Pamal Broadcasting Ltd	Peekskill, NY	Westchester
WNLG	FM	92.1	C	Nws/Inf/Old	Nassau-Suffolk, NY	20		07/20/2010	20		Main Street Broadcasting Co Inc	Sag Harbor, NY	Suffolk
WLTW	FM	106.7	C	Lite AC	New York, NY	1		07/02/2003	1		iHeartMedia	New York, NY	New York
WMCA	AM	570	C	Chrst/Talk	New York, NY	1		07/02/2003	1		Salem Media Group Inc	New York, NY	New York
WMCX	FM	88.9	NC	Alternative	Monmouth-Ocean, NJ	53		07/02/2003	53		Monmouth University	West Long Branch, NJ	Monmouth
WMGQ	FM	98.3	C	Rock AC	Middlesex-Somerset-Union, NJ	42		07/02/2003	42		Beasley Media Group	New Brunswick, NJ	Middlesex
WMSC	FM	90.3	NC	Alternative	New York, NY	1		07/02/2003	1		Montclair State University	Upper Montclair, NJ	Essex
WMTR	AM	1250	C	Clisc Hits	Morristown, NJ	121		07/02/2003	121		Beasley Media Group	Morristown, NJ	Morris
WNBK	FM	103.9	C	Urban AC	Hudson Valley, NY	40		10/28/2011	40		Cumulus Media Holdings Inc	Bronxville, NY	Westchester
WNEW	FM	102.7	C	Hot AC	New York, NY	1		07/02/2003	1		CBS Radio	New York, NY	New York
WNLK	AM	1350	NC	NPR/Nws/TI	Stamford-Norwalk, CT	149		07/02/2003	149		Sacred Heart University Incorporated	Norwalk, CT	Fairfield
WNSH	FM	94.7	C	Country	New York, NY	1		10/28/2011	1		Cumulus Media Holdings Inc	Newark, NJ	Essex
WNSW	AM	1430	NC	Relgn/Talk	New York, NY	1		07/02/2003	1		Starboard Media Foundation Inc D/B/A Relevant	Newark, NJ	Essex
WNYC	AM	820	NC	News/Talk	New York, NY	1		07/02/2003	1		New York Public Radio	New York, NY	New York
WNYC	FM	93.9	NC	News/Talk	New York, NY	1		07/02/2003	1		New York Public Radio	New York, NY	New York
WNYE	FM	91.5	NC	Educa/Varty	New York, NY	1		07/02/2003	1		NYC Dept of Inf Tech & Telecom	New York, NY	New York
WNYG	AM	1440	C	Span/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Radio Canticco Nuevo Inc	Medford, NY	Suffolk
WNYH	AM	740	C	Span/Chrst	Nassau-Suffolk, NY	20		07/02/2003	20		Win Radio Broadcasting Corporation	Huntington, NY	Suffolk
WNYK	FM	88.7	NC	Rck/Alt/Cst	Hudson Valley, NY	40		10/28/2011	40		Nyack College	Nyack, NY	Rockland
WNYM	AM	970	C	News/Talk	New York, NY	1		07/02/2003	1		Salem Media Group Inc	Hackensack, NJ	Bergen
WNYU	FM	89.1	NC	Alternative	New York, NY	1		07/02/2003	1		New York University	New York, NY	New York

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/ FM	Type	Market		Home Market	City & State of License	County of License
			Designtn	Home Mkt			
			Date	Rank	Owner		
WOR	AM	710 C	News/Talk	New York, NY	1	iHeartMedia	New York, NY
WOSS	FM	91.1 NC	Variety	Hudson Valley, NY	40	Union Free School District #1	Ossining, NY
WPAT	AM	930 C	Ethnc/Intnl	New York, NY	1	Multicultural Radio Broadcasting Inc	Paterson, NJ
WPAT	FM	93.1 C	Spanish AC	New York, NY	1	Spanish Broadcasting System	Paterson, NJ
WPDI	FM	103.9 NC	Span/Chrst	Monmouth-Ocean, NJ	53	Cantico Nuevo Ministry Inc	Hazlet, NJ
WPLJ	FM	95.5 C	Hot AC	New York, NY	1	Cumulus Media Holdings Inc	New York, NY
WPOB	FM	88.5 NC	Variety	Nassau-Suffolk, NY	20	Plainview-Old Bethpage Central School District	Plainview, NY
WPPB	FM	88.3 NC	NPR/Nws/Ja	Nassau-Suffolk, NY	20	Peconic Public Broadcasting	Southampton, NY
WPSC	FM	88.7 NC	Alternative	New York, NY	1	William Patterson College of New Jersey	Wayne, NJ
WPTY	FM	105.3 C	Rhymc/Dan	Nassau-Suffolk, NY	20	JVC Media LLC	Calverton-Roanoke, NY
WPUT	FM	90.1 NC	Jazz/AdStd	Hudson Valley, NY	40	Vineyard Public Radio Inc	North Salem, NY
WQBU	FM	92.7 C	Mexican	Nassau-Suffolk, NY	20	Univision	Garden City, NY
WQHT	FM	97.1 C	HpHop/Rthy	New York, NY	1	Emmis Communications	New York, NY
WQXR	FM	105.9 NC	Classical	New York, NY	1	New York Public Radio	Newark, NJ
WQXW	FM	90.3 NC	Classical	Hudson Valley, NY	40	New York Public Radio	Ossining, NY
WRCN	FM	103.9 C	News/Talk	Nassau-Suffolk, NY	20	JVC Media LLC	Riverhead, NY
WRCR	AM	1700 C	Nws/Tlk/SA	Hudson Valley, NY	40	Alexander Broadcasting Inc	Ramapo, NY
WRDR	FM	89.7 NC	Christian	Monmouth-Ocean, NJ	53	Bridglight LLC	Freehold Township, NJ
WRHU	FM	88.7 NC	Variety	Nassau-Suffolk, NY	20	Hofstra University	Hempstead, NY
WRIV	AM	1390 C	Adlt Strndrd	Nassau-Suffolk, NY	20	Crystal Coast Communications Inc	Riverhead, NY
WRKL	AM	910 C	Polish	Hudson Valley, NY	40	Polinet Communications Ltd	New City, NY
WRLI	FM	91.3 NC	News/Talk	Nassau-Suffolk, NY	20	Connecticut Public Broadcasting Incorporated	Southampton, NY
WRPR	FM	90.3 NC	CHR	New York, NY	1	Ramapo College of New Jersey	Mahwah, NJ
WRSU	FM	88.7 NC	Alternative	Middlesex-Somerset-Union, NJ	42	Rutgers University Board of Governors	New Brunswick, NJ
WRVP	AM	1310 NC	Span/Chrst	Hudson Valley, NY	40	Radio Vision Cristiana Management	Mount Kisco, NY
WSHR	FM	91.9 NC	CHR/Varty	Nassau-Suffolk, NY	20	Sachem Central School District Holbrook	Lake Ronkonkoma, NY
WSHU	AM	1260 NC	NPR/Nws/TI	New Haven, CT	122	Sacred Heart University Incorporated	Westport, CT
WSIA	FM	88.9 NC	Alternative	New York, NY	1	College of Staten Island	Staten Island, NY
WSKQ	FM	97.9 C	Tropical	New York, NY	1	Spanish Broadcasting System	New York, NY
WSLX	FM	91.9 NC	Variety	Stamford-Norwalk, CT	149	Saint Luke's Foundation Inc	New Canaan, CT
WSNR	AM	620 C	Ethnic	New York, NY	1	Davidzon Radio Inc	Jersey City, NJ
WSOU	FM	89.5 NC	Rock	New York, NY	1	Seton Hall University	South Orange, NJ
WSTC	AM	1400 NC	NPR/Nws/TI	Stamford-Norwalk, CT	149	Sacred Heart University Incorporated	Stamford, CT

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for New York, NY

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WSUF	FM	89.9	NC	NPR/Nws/TT	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/20/2010	20	Sacred Heart University Incorporated	Noyack, NY	Suffolk
WTHE	AM	1520	C	Gospel	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	Universal Broadcasting	Mineola, NY	Nassau
WUSB	FM	90.1	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	State University of New York	Stony Brook, NY	Suffolk
WWIP	FM	93.5	C	Ethnic	Hudson Valley, NY	Hudson Valley, NY	10/28/2011	40	Hudson Westchester	New Rochelle, NY	Westchester
WWNJ	AM	1160	C	News/Talk	New York, NY	New York, NY	07/02/2003	1	Universal Broadcasting	Oakland, NJ	Bergen
WVOX	AM	1460	C	Nws/TTk/Inf	Hudson Valley, NY	Hudson Valley, NY	10/28/2011	40	Hudson Westchester	New Rochelle, NY	Westchester
WWPH	FM	90.3	NC	Rock/Urban	Middlesex-Somerset-Union, NJ	Middlesex-Somerset-Union, NJ	07/02/2003	42	Piscataway Board of Education	Piscataway, NJ	Middlesex
WWES	FM	88.9	NC	Nws/TTk/Inf	Hudson Valley, NY	Hudson Valley, NY	10/28/2011	40	WAMC/Northeast Public Radio	Mount Kisco, NY	Westchester
WWPR	FM	105.1	C	Urban	New York, NY	New York, NY	07/02/2003	1	iHeartMedia	New York, NY	New York
WWPT	FM	90.3	NC	Variety	Stamford-Norwalk, CT	Stamford-Norwalk, CT	07/02/2003	149	Westport Board of Education	Westport, CT	Fairfield
WWRL	AM	1600	C	Asian	New York, NY	New York, NY	07/02/2003	1	NJ Broadcasting LLC	New York, NY	New York
WWRU	AM	1660	C	Korean	New York, NY	New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	Jersey City, NJ	Hudson
WWRV	AM	1330	NC	Span/Chrst	New York, NY	New York, NY	07/02/2003	1	Radio Vision Cristiana Management	New York, NY	New York
WWSK	FM	94.3	C	Rock	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	Connoisseur Media Limited Liability Company	Smithtown, NY	Suffolk
WWTR	AM	1170	C	Ethnic	Middlesex-Somerset-Union, NJ	Middlesex-Somerset-Union, NJ	07/02/2003	42	EBC Music Inc	Bridgewater, NJ	Somerset
WWZY	FM	107.1	C	Modern AC	Monmouth-Ocean, NJ	Monmouth-Ocean, NJ	07/02/2003	53	Press Communications LLC	Long Branch, NJ	Monmouth
WXBA	FM	88.1	NC	Variety	Nassau-Suffolk, NY	Nassau-Suffolk, NY	07/02/2003	20	Brentwood Union Free School District	Brentwood, NY	Suffolk
WXMC	AM	1310	C	Asian	Morristown, NJ	Morristown, NJ	07/02/2003	121	World India Radio LLC	Parsippany, NJ	Morris
WXNY	FM	96.3	C	Spanish AC	New York, NY	New York, NY	07/02/2003	1	Univision	New York, NY	New York
WXPB	FM	107.1	C	Rock	Hudson Valley, NY	Hudson Valley, NY	10/28/2011	40	Pamal Broadcasting Ltd	Briarcliff Manor, NY	Westchester
WYGG	FM	88.1	NC	Ethnc/Relgn	Monmouth-Ocean, NJ	Monmouth-Ocean, NJ	07/02/2003	53	Minority Business & Housing Development Inc	Asbury Park, NJ	Monmouth
WZRC	AM	1480	C	Asian	New York, NY	New York, NY	07/02/2003	1	MultiCultural Radio Broadcasting Inc	New York, NY	New York

Number of Stations in Geographic Market 154

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

Exhibit 2



October 30, 2017

Jeffrey Warshaw
CEO
Connoisseur Media, LLC
180 Post Road East, Suite 201
Westport, CT 06880

Dear Jeff:

Thank you for your letter regarding embedded market stations. We confirm each of the understandings described in your letter with two clarifications.

First, we believe that the FCC's assessment of local radio station ownership limits is informed by home to metro status as determined by BIA Kelsey. BIA Kelsey is not affiliated with Nielsen.

Second, while Nielsen automatically assigns a local radio station as Home to the Metro if the station's city of license is located within a Nielsen radio Metro Survey Area, our Home-to-Metro status is not limited solely to geographical boundaries. Nielsen also grants requests from subscribing stations that are licensed by the FCC to geographies located beyond the borders of a Nielsen metro to be listed as home to a Nielsen metro. We call this "Elective Metro Home Status." For this and other reasons, BIA Kelsey's home to metro designation may differ in some cases from Nielsen's classification.

As always, thank you for your business and leadership. Please let us know if we can help with any further information.

Regards,

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Rose".

Bill Rose
Senior Vice President, Local Media Product Leadership

Cc: Brad Kelly, Managing Director, Nielsen Audio
Daniel Monistere, SVP Policies and Guidelines
Denise Safko, VP, Product Leadership
Ryan Samuels, Director, Audio Policy
John Nolan, VP Sales Director, Nielsen Audio



Nielsen
85 Broad Street
New York, NY 10004
tel 646-362-0243 cell 609-658-9167
www.nielsen.com



October 27, 2017

Bill Rose
Senior Vice President – Local Media Product Leadership
Nielsen Audio
85 Broad St
New York, NY 10004

Re: Embedded Market Stations

Dear Bill:

As you know, Connoisseur Media LLC has requested that the Federal Communications Commission change its treatment, for purposes of analyzing the local radio ownership rules, of stations located in embedded markets. Connoisseur has been contending that stations that are home to embedded markets are not true competitors in the greater “parent” market, and that Nielsen’s including them above-the-line in the parent market ratings books does not reflect any reasoned determination by Nielsen that these stations are true competitors in the parent market, but instead it merely acknowledges that they are stations with a city of license that is geographically located within the geographic boundaries of the parent market. In other words, being listed above-the-line is simply a statement of geography, not an analysis of actual competition.

It is our understanding that, if the embedded market stations were truly competitors in the greater parent market, there would be no need for embedded markets at all. If, for instance, stations licensed to Monmouth County or Nassau/Suffolk were really looking to be competitors in New York, then there would be no need for an embedded market report, as these stations would simply be included in the New York ratings book. Instead, each embedded market was created to acknowledge that these markets were markets unto themselves, where the stations home to those markets compete among themselves instead of in the greater parent market.

These geographic areas are considered “embedded” not because the local stations in those markets compete in the greater parent market, but instead because the stations from the heart of the parent market compete in the counties or other geographic subdivisions that comprise the embedded market. The geographic areas Nielsen has identified as “embedded” are a reflection that these areas are part of the area from which stations home to the core of the parent market look to draw listeners and revenue.

The fact that stations home to the embedded market are listed as “above-the-line” in the parent market is not, as suggested by the FCC in its draft decision on the ownership rules, any determination by Nielsen that these stations compete in that parent market. Instead it is merely an acknowledgement that these stations are licensed to communities that happen to fall within the geographic boundaries of the greater parent market. We understand that it is Nielsen’s policy

to list above-the-line any station licensed to a community in a geographic area that is included within the boundaries of a market. It is a geographic determination, not a competitive one.

Could you confirm these understandings? Your response will be very helpful in our attempts to convince the FCC that they have read more than you intended into your listing of embedded market stations as being above-the-line in the parent market.

Thank you for your assistance on this matter, and please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. Warshaw". The signature is stylized with a large, sweeping "J" and "W".

Jeffrey D. Warshaw

CEO

Connoisseur Media, LLC

Exhibit 3



FCC Geographic Market Definition for Nassau-Suffolk, NY

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market		Owner	City & State of License	County of License
						Designtn	Home Mkt Rank			
WALK	AM	1370	C	Adlt Stndrd	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Patchogue, NY	Suffolk
WALK	FM	97.5	C	Hot AC	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Patchogue, NY	Suffolk
WBAB	FM	102.3	C	Cisc Rock	Nassau-Suffolk, NY	07/02/2003	20	Cox Media Group	Babylon, NY	Suffolk
WBAZ	FM	102.5	C	AC	Nassau-Suffolk, NY	07/20/2010	20	LRS Radio LLC	Bridgehampton, NY	Suffolk
WBEA	FM	101.7	C	CHR	Nassau-Suffolk, NY	07/20/2010	20	LRS Radio LLC	Southold, NY	Suffolk
WBLI	FM	106.1	C	CHR	Nassau-Suffolk, NY	07/02/2003	20	Cox Media Group	Patchogue, NY	Suffolk
WBON	FM	98.5	C	Latino	Nassau-Suffolk, NY	07/20/2010	20	JVC Media LLC	Westhampton, NY	Suffolk
WBZO	FM	103.1	C	Cisc Hits	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Bay Shore, NY	Suffolk
WCWP	FM	88.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Long Island University Public Radio	Brookville, NY	Nassau
WEER	FM	88.7	NC	Public Svc	Nassau-Suffolk, NY	08/30/2006	20	Eastern Tower Corp	Montauk, NY	Suffolk
WEGB	FM	90.7	NC	Religion	Nassau-Suffolk, NY	10/31/2011	20	Community Bible Church	Napeague, NY	Suffolk
WEGQ	FM	91.7	NC	Religion	Nassau-Suffolk, NY	06/27/2013	20	Community Bible Church	Quogue, NY	Suffolk
WEHM	FM	92.9	C	AAA	Nassau-Suffolk, NY	07/15/2010	20	LRS Radio LLC	Manorville, NY	Suffolk
WEHN	FM	96.9	C	AAA	Nassau-Suffolk, NY	07/20/2010	20	LRS Radio LLC	East Hampton, NY	Suffolk
WFRS	FM	88.9	NC	Religion	Nassau-Suffolk, NY	07/02/2003	20	Family Stations Incorporated	Smithtown, NY	Suffolk
WFTU	AM	1570	C	Alternative	Nassau-Suffolk, NY	07/20/2010	20	Five Towns College	Riverhead, NY	Suffolk
WGBB	AM	1240	C	Asian/Varty	Nassau-Suffolk, NY	07/02/2003	20	WGBB-AM Inc	Freeport, NY	Nassau
WGSS	FM	89.3	NC	Religion	Nassau-Suffolk, NY	04/24/2012	20	Calvary Chapel of Hope	Copague, NY	Suffolk
WHFM	FM	95.3	C	Cisc Rock	Nassau-Suffolk, NY	07/20/2010	20	Cox Media Group	Southampton, NY	Suffolk
WHLI	AM	1100	C	Adlt Stndrd	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WHPC	FM	90.3	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Nassau Community College	Garden City, NY	Nassau
WJFF	FM	94.9	C	News/Talk	Nassau-Suffolk, NY	02/29/2012	20	Red Wolf Broadcasting Corporation	Montauk, NY	Suffolk
WJVC	FM	96.1	C	Country	Nassau-Suffolk, NY	07/02/2003	20	JVC Media LLC	Center Moriches, NY	Suffolk
WKJY	FM	98.3	C	AC	Nassau-Suffolk, NY	07/02/2003	20	p Connoisseur Media Limited Liability Company	Hempstead, NY	Nassau
WKTU	FM	103.5	C	CHR/Rhymc	New York, NY	07/02/2003	1	iHeartMedia	Lake Success, NY	Nassau
WKWZ	FM	88.5	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Syosset Central School District	Syosset, NY	Nassau
WLIE	AM	540	C	Span/Chrst	Nassau-Suffolk, NY	07/02/2003	20	Principle Broadcasting Network LLC	Islip, NY	Suffolk
WLIM	AM	1580	C	Polish	Nassau-Suffolk, NY	07/02/2003	20	Polnet Communications Ltd	Patchogue, NY	Suffolk
WLIR	FM	107.1	C	ChrsContem	Nassau-Suffolk, NY	07/20/2010	20	Livingstone Broadcasting Inc	Hampton Bays, NY	Suffolk
WLNK	FM	92.1	C	Nws/Inf/Old	Nassau-Suffolk, NY	07/20/2010	20	Main Street Broadcasting Co Inc	Sag Harbor, NY	Suffolk
WNYG	AM	1440	C	Span/Chrst	Nassau-Suffolk, NY	07/02/2003	20	Radio Cantico Nuevo Inc	Medford, NY	Suffolk
WNYH	AM	740	C	Span/Chrst	Nassau-Suffolk, NY	07/02/2003	20	Win Radio Broadcasting Corporation	Huntington, NY	Suffolk
WPOB	FM	88.5	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Plainview-Old Bethpage Central School District	Plainview, NY	Nassau

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Nassau-Suffolk, NY

Call Letters	AM/FM	Freq	Station Type	Format	Home Market	Market Designtn		Owner	City & State of License	County of License
						Date	Home Mkt Rank			
WPPB	FM	88.3	NC	NPR/Nws/Ja	Nassau-Suffolk, NY	07/20/2010	20	Peconic Public Broadcasting	Southampton, NY	Suffolk
WPTY	FM	105.3	C	Rhymc/Dan	Nassau-Suffolk, NY	07/20/2010	20	JVC Media LLC	Calverton-Roanoke, NY	Suffolk
WQBU	FM	92.7	C	Mexican	Nassau-Suffolk, NY	07/02/2003	20	Univision	Garden City, NY	Nassau
WRCN	FM	103.9	C	News/Talk	Nassau-Suffolk, NY	07/20/2010	20	JVC Media LLC	Riverhead, NY	Suffolk
WRHU	FM	88.7	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Hofstra University	Hempstead, NY	Nassau
WRIV	AM	1390	C	Adlt Stndrd	Nassau-Suffolk, NY	07/20/2010	20	Crystal Coast Communications Inc	Riverhead, NY	Suffolk
WRLI	FM	91.3	NC	News/Talk	Nassau-Suffolk, NY	07/20/2010	20	Connecticut Public Broadcasting Incorporated	Southampton, NY	Suffolk
WSHR	FM	91.9	NC	CHR/Varty	Nassau-Suffolk, NY	07/02/2003	20	Sachem Central School District Holbrook	Lake Ronkonkoma, NY	Suffolk
WSUF	FM	89.9	NC	NPR/Nws/TI	Nassau-Suffolk, NY	07/20/2010	20	Sacred Heart University Incorporated	Noyack, NY	Suffolk
WTHE	AM	1520	C	Gospel	Nassau-Suffolk, NY	07/02/2003	20	Universal Broadcasting	Mineola, NY	Nassau
WUSB	FM	90.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	State University of New York	Stony Brook, NY	Suffolk
WWSK	FM	94.3	C	Rock	Nassau-Suffolk, NY	07/02/2003	20	Connoisseur Media Limited Liability Company	Smithtown, NY	Suffolk
WXBA	FM	88.1	NC	Variety	Nassau-Suffolk, NY	07/02/2003	20	Brentwood Union Free School District	Brentwood, NY	Suffolk

Number of Stations in Geographic Market 46

Previous Stations in Geographic Market

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed